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UNITED STATES DISTRICT COURT

for the

Central District of California

Division



BRANDI MONTANA

Case No. **CV-6873-SVW(ASx)**

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

CIGNA AND CAREALLIES

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE (28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	BRANDI MONTANA
Street Address	5870 MELROSE AVENUE STE. 3 #451
City and County	LOS ANGELES AND COUNTY OF LOS ANGELES
State and Zip Code	CALIFORNIA AND 90038
Telephone Number	903-258-3841
E-mail Address	MONTANA.BRANDI@YAHOO.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	CIGNA
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Job or Title <i>(if known)</i>	
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Street Address	900 COTTAGE GROVE ROAD
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City and County	BLOOMFIELD AND COUNTY OF HARTFORD
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State and Zip Code	CONNECTICUT 06002
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Telephone Number	18002446224
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E-mail Address <i>(if known)</i>	LETUSHELPU@CIGNA.COM
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Defendant No. 2

Name	CAREALLIES
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Job or Title <i>(if known)</i>	
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Street Address	1601 CHESTNUT STREET
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City and County	PHILADELPHIA AND COUNTY OF PHILADELPHIA
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State and Zip Code	PENNSYLVANIA 19192
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Telephone Number	18002327497
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E-mail Address <i>(if known)</i>	LETUSHELPU@CIGNA.COM
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Defendant No. 3

Name	
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Job or Title <i>(if known)</i>	
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Street Address	
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City and County	
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State and Zip Code	
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Telephone Number	
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E-mail Address <i>(if known)</i>	
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Defendant No. 4

Name	
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Job or Title <i>(if known)</i>	
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Street Address	
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City and County	
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State and Zip Code	
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Telephone Number	
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E-mail Address <i>(if known)</i>	
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II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) BRANDI MONTANA, is a citizen of the
State of (name) CALIFORNIA.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) CIGNA AND CAREALLIES, is incorporated under
the laws of the State of (name) CONNECTICUT AND PENNSYLVANIA, and has its
principal place of business in the State of (name) CONNECTICUT AND PENNSYLVANIA.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) CONNECTICUT AND PENNSYLVANIA.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

CIGNA AND CAREALLIES WERE NEGLIGENT WITH THEIR ACTIONS DURING THE EMPLOYMENT OF BRANDI MONTANA, IN WHICH THERE WERE CONTRACTUAL OBLIGATIONS.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 09/17/2022, at (place) CIGNA AND CAREALLIES,

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

- 1.) BRANDI MONTANA REQUESTED NUMEROUS TIMES DURING HER EMPLOYMENT WITH CIGNA AND CAREALLIES TO BE MOVED OUT FROM UNDER THE SUPERVISION OF CHAUN TATUM-WILLIAMS.
- 2.) THE OFFICE OF CIVIL RIGHTS WAS NOTIFIED OF A SERIOUS BREACH MADE BY IN WHOLE AND IN PART BY CIGNA AND CAREALLIES. PLEASE SEE THE NOTICE SENT TO SMITH COUNTY SHERIFF'S OFFICE DATED SEPTEMBER 17, 2022 DETAILING THE BREACH AS WELL AS THE OUTREACH TO CIGNA AND THE OFFICE OF CIVIL RIGHTS. THE NOTICE AND LETTER IS ATTACHED FOR REFERENCE. +

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

ON NOVEMBER 18, 2021, MS. MONTANA WAS FORCED TO CHANGE HER LEGAL NAME FROM BRANDI NICOLE RODRIGUEZ TO BRANDI MONTANA DUE TO THE NEGLIGENT ACTS AND BREACH MADE BY SAID PARTIES. THE EXTREME NEGLIGENCE HAS CAUSED GRIEF AND LIFE-LONG SAFETY CONCERNS FOR MS. MONTANA. THE ORDER SIGNED BY THE JUDGE IS ATTACHED FOR REFERENCE. THE DISCOVERY OF HARM BY THE GLOBAL ORGANIZATION PROMPTED NUMEROUS NOTIFICATIONS TO THE AUTHORITIES. +

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

THE TOTAL AMOUNT FOR DAMAGES AND RELIEF SOUGHT ARE \$300,000.00.

AUGUST 17, 2019 IS THE DATE MS. MONTANA RESIGNED FROM CIGNA AND CAREALLIES. HER RESIGNATION INCURRED LEGAL COSTS IN ADDITION TO THE LOSS OF THE ANNUAL INCOME OF \$75,000.00.

AUGUST 12, 2020 MS. MONTANA SUSTAINED PERMANENT INJURIES FROM THE TOTAL LOSS OF HER 2015 LEXUS RX 350 DURING A ROLLOVER.

MAY 9, 2021 MS. MONTANA SUSTAINED ADDITIONAL INJURIES DUE TO A TOTAL LOSS OF HER 2004 CHEVROLET SILVERADO IN ANOTHER ROLLOVER.

THE PROPER AUTHORITIES WERE NOTIFIED AND THE LOSS OF BOTH VEHICLES, AS WELL AS HER INJURIES AMOUNT TO APPROXIMATELY \$200,000 WORTH OF DAMAGE. HER SAFETY AND SECURITY WAS JEAPORDIZED AND CONTINUES TO BE ONGOING AND PROBLEMATIC, IN WHICH A LEGAL NAME CHANGE HAS BEEN UNABLE TO REMEDY. +

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/19/2022

Signature of Plaintiff BRANDI MONTANA
 Printed Name of Plaintiff BRANDI MONTANA

B. For Attorneys

Date of signing: _____

Signature of Attorney _____
 Printed Name of Attorney _____
 Bar Number _____
 Name of Law Firm _____
 Street Address _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____